

## O'Tormey, Sean P (FAA)

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**From:** Reaves, David (FAA)  
**Sent:** Thursday, October 14, 2021 3:19 PM  
**To:** Thomas White  
**Cc:** O'Tormey, Sean P (FAA); N. Richene Oliver, ACP, FRP; Grant J. Guillot  
**Subject:** RE: Request for Information No. 2 - Draganfly, Inc. (Docket FAA-2021-0745) - response required by October 15, 2021

Mr. Thomas White, Agent for:  
Mr. John Bagocius  
Draganfly, Inc.  
3910 RCA Boulevard, Suite 1015  
Palm Beach Gardens, FL 33410 USA

Dear Mr. White:

Thank you for responding to our first request for information. The following information is required to continue processing the petition for exemption, Docket No. FAA-2021-0745, which you submitted on behalf of Draganfly Inc. We request you provide the following information to us no later than October 27, 2021:

1. Please provide a comprehensive flight operations and procedures manual. In your petition for exemption you state, "The relief requested is similar to relief previously granted for operations over 55 pounds in Exemption No. 18009, Powers Flight Group." In Exemption No. 18009, Powers Flight Group provided a flight operations and procedures manual as part of their risk mitigation strategy. Your flight operations and procedures manual should include flying procedures, pre-and post-flight procedures, and maintenance information.
2. Please provide a comprehensive operational risk and safety manual containing a detailed risk analysis specific to your operation. Petitioners who have been issued similar grants of exemption (see Exemption No. 18009) have provided a comprehensive operational risk and safety manual. Your operational risk and safety manual should identify risks specific to your operation, provide procedures to mitigate those risks, and determine whether the residual risk level is acceptable.

Please submit the additional information (non-proprietary) as a comment to your docket at [www.regulations.gov](http://www.regulations.gov), and save the tracking number generated after submission. Proprietary information may be submitted electronically to David Reaves at [david.reaves@faa.gov](mailto:david.reaves@faa.gov) and Sean O'Tormey at [sean.p.o'tormey@faa.gov](mailto:sean.p.o'tormey@faa.gov).

If you want us to process your request any further, we must receive the information described above by October 27, 2021. If we do not receive the information, we will close the docket without notifying you further. If you have any questions or require additional time, you may email us or call (717) 473-0231.



*David Reaves*

Aviation Safety Inspector  
Operations Group | AFS-830

Flight Standards Service  
800 Independence Ave, SW  
Washington, DC 20591  
Text | Phone (717) 473-0231

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**From:** Thomas White <Tom.White@arlaw.com>  
**Sent:** Thursday, October 14, 2021 2:33 PM  
**To:** Reaves, David (FAA) <david.reaves@faa.gov>  
**Cc:** O'Tormey, Sean P (FAA) <Sean.P.O'Tormey@faa.gov>; N. Richene Oliver, ACP, FRP <Richene.Oliver@arlaw.com>; Grant J. Guillot <Grant.Guillot@arlaw.com>  
**Subject:** RE: Request for Information - Draganfly, Inc. (Docket FAA-2021-0745) - response required by October 15, 2021

Hello Mr. Reaves:

Thank you again for the discussion yesterday. I know when we ended the call you mentioned a forthcoming e-mail stating the information the FAA requests at this point, as well as a new deadline to provide those materials. I hadn't seen that communication yet, and just wanted to follow-up to be sure I hadn't missed it.

Thank you very much.  
Tom White

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**From:** Thomas White  
**Sent:** Friday, October 8, 2021 9:54 AM  
**To:** 'Reaves, David (FAA)' <[david.reaves@faa.gov](mailto:david.reaves@faa.gov)>  
**Cc:** O'Tormey, Sean P (FAA) <Sean.P.O'Tormey@faa.gov>; N. Richene Oliver, ACP, FRP <[richene.oliver@arlaw.com](mailto:richene.oliver@arlaw.com)>; Grant J. Guillot <[grant.guillot@arlaw.com](mailto:grant.guillot@arlaw.com)>  
**Subject:** RE: Request for Information - Draganfly, Inc. (Docket FAA-2021-0745) - response required by October 15, 2021

Hello Mr. Reaves,

Thank you very much. Yes, I am available at 10:00 am next Wednesday morning, and that will work perfectly.

Tom White

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**From:** Reaves, David (FAA) <[david.reaves@faa.gov](mailto:david.reaves@faa.gov)>  
**Sent:** Friday, October 8, 2021 9:29 AM  
**To:** Thomas White <[Tom.White@arlaw.com](mailto:Tom.White@arlaw.com)>  
**Cc:** O'Tormey, Sean P (FAA) <Sean.P.O'Tormey@faa.gov>  
**Subject:** RE: Request for Information - Draganfly, Inc. (Docket FAA-2021-0745) - response required by October 15, 2021

Mr. White,

I can set up a Zoom meeting with you for next Wednesday morning. Would 1000 EDT be acceptable? I will be joined by a colleague as well. Thank you.



*David Reaves*

Aviation Safety Inspector  
Operations Group | AFS-830

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**From:** Thomas White <[Tom.White@arlaw.com](mailto:Tom.White@arlaw.com)>

**Sent:** Wednesday, October 06, 2021 5:20 PM

**To:** Reaves, David (FAA) <[david.reaves@faa.gov](mailto:david.reaves@faa.gov)>; O'Tormey, Sean P (FAA) <[Sean.P.O'Tormey@faa.gov](mailto:Sean.P.O'Tormey@faa.gov)>

**Cc:** Grant J. Guillot <[Grant.Guillot@arlaw.com](mailto:Grant.Guillot@arlaw.com)>

**Subject:** RE: Request for Information - Draganfly, Inc. (Docket FAA-2021-0745) - response required by October 15, 2021

Hello Mr. Reaves and Mr. O'Tormey::

My name is Tom White, and I work with Grant Guillot on behalf of our client Draganfly, Inc. Please find attached an electronic copy of our prior communication to USDOT Docket Operations. We apologize that it appears this information was not appropriately routed to your attention. As referenced in the attached communication, the enclosed documents are submitted confidentially as they contain confidential information that is commercial and proprietary.

I believe this information is responsive to your item numbers 2 and 4, and may possibly be responsive to other requests below.

We will be reviewing your other requests with Draganfly this week, but I anticipate we may have questions about which of your items below are still needed following your review of the attached. Would you be available for a call sometime in the next several business days to address what remains outstanding?

Thank you very much,  
Tom White



**Thomas White**  
Associate

ADAMS AND REESE LLP

501 Riverside Avenue, Suite 601 | Jacksonville, FL 32202  
**Main** 904.355.1700 | **Direct** 904.394.1643  
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**Website** | **Bio** | **vCard** | **Map** | [in](#) [twitter](#) [f](#) [v](#)

[View our COVID-19 resources.](#)

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**From:** Reaves, David (FAA) <[david.reaves@faa.gov](mailto:david.reaves@faa.gov)>

**Sent:** Friday, October 1, 2021 9:35 AM

**To:** Grant J. Guillot <[Grant.Guillot@arlaw.com](mailto:Grant.Guillot@arlaw.com)>

**Cc:** O'Tormey, Sean P (FAA) <[Sean.P.O'Tormey@faa.gov](mailto:Sean.P.O'Tormey@faa.gov)>

**Subject:** Request for Information - Draganfly, Inc. (Docket FAA-2021-0745) - response required by October 15, 2021

Mr. Grant J. Guillot, Agent for:

Mr. John Bagocius

Draganfly, Inc.

3910 RCA Boulevard, Suite 1015

Palm Beach Gardens, FL 33410 USA

Dear Mr. Bagocius:

The following information is required to continue processing the petition for exemption, Docket No. FAA-2021-0745, which you submitted on behalf of Draganfly Inc. We request you provide the following information to us no later than October 15, 2021:

1. Please provide a comprehensive flight operations and procedures manual. In your petition for exemption you state, "The relief requested is similar to relief previously granted for operations over 55 pounds in Exemption No. 18009, Powers Flight Group." In Exemption No. 18009, Powers Flight Group provided a flight operations and procedures manual as part of their risk mitigation strategy. Your flight operations and procedures manual should include flying procedures, pre-and post-flight procedures, and maintenance information.
2. Please provide a comprehensive training and certification program. In your petition, you state in Section IV, "Additionally, Petitioner is submitting the documents listed below on a confidential basis under separate cover, pursuant to 14 C.F.R. § 11.35(b):
  - 1) Petitioner's Drone Pilot Training Program and Checklists
  - 2) Petitioner's Training Outline for New Spraying Ops Drone Pilots
  - 3) Petitioner's T20 Drone Pilot Assessment
  - 4) Petitioner's Digital Spraying Log"

We have not received these documents. Petitioners who have been issued similar grants of exemption (see Exemption No. 18009) have provided a comprehensive training and certification program. Your operator's training program should be a comprehensive training course tailored for the proposed operations that includes theory and practical components, a pilot theory exam, and supervised operational familiarization training on agricultural spraying. Additionally, the training program requirements should include examination, flight test, and continued periodic training.

3. Please provide a comprehensive operational risk and safety manual containing a detailed risk analysis specific to your operation. Petitioners who have been issued similar grants of exemption (see Exemption No. 18009) have provided a comprehensive operational risk and safety manual. Your operational risk and safety manual should identify risks specific to your operation, provide procedures to mitigate those risks, and determine whether the residual risk level is acceptable.
4. Please provide the "various checklists" listed in your petition for exemption. In your petition for exemption you state, "The PIC and APIC will also have various checklists related to their (a) equipment, (b) arrival and setup at the operations location, (c) the before start inspection, (d) the before start "run-up" inspection, (e) the spraying operations, (f) the after spraying flush of the T20, and (g) securing the T20 at the conclusion of the operation. The PIC and APIC will also maintain checklists relating to various abnormal and emergency scenarios such as a drone crash or fire, a battery charger fire, unknown person in ops area, and T20 controller issues." If complete

copies of these checklists are contained in the Operations and Procedures Manual referenced in 1. above, you may disregard this request.

Please submit the additional information (non-proprietary) as a comment to your docket at [www.regulations.gov](http://www.regulations.gov), and save the tracking number generated after submission. Proprietary information may be submitted electronically to David Reaves at [david.reaves@faa.gov](mailto:david.reaves@faa.gov) and Sean O'Tormey at [sean.p.o'tormey@faa.gov](mailto:sean.p.o'tormey@faa.gov).

If you want us to process your request any further, we must receive the information described above by October 15, 2021. If we do not receive the information, we will close the docket without notifying you further. If you have any questions or require additional time, you may email us or call (717) 473-0231. Thank you.

Sincerely yours,



*David Reaves*

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